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6 Attorney for Carla Peterson

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8 **UNITED STATES DISTRICT COURT**  
9 **DISTRICT OF NEVADA**

10 UNITED STATES OF AMERICA,  
11 Plaintiff,  
12 v.  
13 CARLA PETERSON,  
14 Defendant.

Case No. 2:19-cr-00119-JAD-NJK

**THIRD STIPULATION TO  
MODIFY PRETRIAL RELEASE  
CONDITIONS<sup>1</sup>**

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16 IT IS HEREBY STIPULATED AND AGREED, by and between United States Attorney  
17 Nicholas A. Trutanich and Assistant United States Attorney Christopher Burton, counsel for the  
18 United States of America, and Federal Public Defender Rene L. Valladares and Assistant Federal  
19 Public Defender Sylvia Irvin, counsel for Carla Peterson, that her conditions of release be  
20 modified for the following reasons:

21 1. On June 6, 2018, Ms. Peterson made her initial appearance and was released on a  
22 personal recognizance bond with specified conditions of pretrial release. *See* ECF No. 13. On  
23 February 20, 2020, Ms. Peterson entered a plea of guilty pursuant to a negotiated plea agreement.  
24 *See* ECF Nos. 37-39. At a hearing later that afternoon, she was admitted into the RISE Court  
25 program. *See* ECF Nos. 40-41.

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<sup>1</sup> This motion is timely filed. There is no deadline for the filing of this motion.

2. As a participant in RISE, Ms. Peterson is subject to her RISE Court contract (ECF No. 41) and conditions of pretrial release including that “The defendant is allowed to travel with prior approval from Pretrial Services.” ECF Nos. 35, ¶74; 13.

3. Undersigned counsel previously asked the Court to modify Ms. Peterson’s travel restriction to allow her to travel for work, first within certain states, and then within the continental United States. ECF Nos. 64, 67. This Court granted the modifications. ECF Nos. 65, 68.

4. Ms. Peterson now asks this Court to travel with her daughter for a personal trip to Maui from December 22-28, 2020. Before Ms. Peterson travels, she understands that she must first consult and abide by the State of Hawaii’s policies and restrictions for travel.

5. Undersigned defense counsel consulted with the Pretrial Services Officer Samira Barlow, and she agrees with the modification of Ms. Peterson’s travel for this trip.

6. Defense counsel and Government counsel agree to the modification of this pretrial condition.

7. Ms. Peterson continues to be in compliance with her pretrial release conditions.

DATED this 15th day of December, 2020.

RENE L. VALLADARES  
Federal Public Defender

NICHOLAS A. TRUTANICH  
United States Attorney

*/s/ Sylvia Irvin*  
By \_\_\_\_\_

SYLVIA IRVIN  
Assistant Federal Public Defender

*/s/ Christopher Burton*  
By \_\_\_\_\_

CHRISTOPHER BURTON  
Assistant United States Attorney

1 UNITED STATES DISTRICT COURT  
2 DISTRICT OF NEVADA

3 UNITED STATES OF AMERICA,  
4

5 Plaintiff,

6 v.

7 CARLA PETERSON,

8 Defendants.  
9

Case No. 2:19-cr-00119-JAD-NJK

**ORDER**

10 Based on the Stipulation of counsel and good cause appearing,

11 IT IS THEREFORE ORDERED that following modifications shall be made to Ms.  
12 Peterson's release conditions:

- 13 1. The defendant may travel to Maui from December 22-28, 2020.  
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15 DATED this 15th day of December, 2020.

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18 UNITED STATES MAGISTRATE JUDGE  
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